

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

RALPH R. NELSON,

Plaintiff,

v.

TONYA MARIE COFFEY (NELSON), et al.

Defendants.

Case No. 04 10845-CAO

Judge

Magistrate Judge

RECEIPT #

AMOUNT \$

BY DPTY CLK

DATE

DISTRICT COURT  
DISTRICT OF MASS.

FILED FEE PAID:

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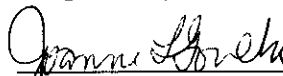
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6/18/04

MOTION FOR ADMISSION OF MARK LANDES AND MATTHEW T. HOLLIS *PRO HAC*  
*VICE* ON BEHALF OF CARLA TOWNSEND, ROBERT SUVER, VIRGINIA BROWN,  
SANDRA MENDENHALL, DEBBIE MARTINEAU, HOLLY PAYNE AND JOEL SALWAY

Pursuant to Local Rule 83.5.3(b), Joanne Goulka respectfully moves for the admission of Mark Landes and Matthew T. Hollis to this Court *pro hac vice* for the purposes of representing defendants Carla Townsend, Robert Suver, Virginia Brown, Sandra Mendenhall, Debbie Martineau, Holly Payne and Joel Salway, all employees of the Clark County Child Support Enforcement Agency in Clark County, Ohio, in the above-captioned matter. A memorandum in support is attached.

Respectfully submitted,



Joanne Goulka

Frank J. Federico, Jr.

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MEMORANDUM IN SUPPORT

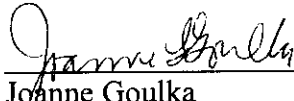
Movants respectfully request the admission *pro hac vice* of Mark Landes and Matthew T. Hollis for the limited purpose of representing defendants Carla Townsend, Robert Suver, Virginia Brown, Sandra Mendenhall, Debbie Martineau, Holly Payne and Joel Salway, all employees of the Clark County Child Support Enforcement Agency, in Clark County, Ohio in the above-captioned matter. Mr. Landes' and Mr. Hollis' law firm, Isaac, Brant, Ledman & Teetor, LLP, in Columbus, Ohio, regularly represents Clark County, Ohio in various civil matters, including disputes regarding child support enforcement.

Mark Landes is admitted to practice in the State Courts of Ohio and Kentucky, the United States District Courts for the Southern and Northern Districts of Ohio, the United States Court of Appeals for the Sixth Circuit, and the United States Supreme Court. He graduated from the Ohio State University Moritz College of Law in 1982 and is a partner with the law firm of Isaac, Brant, Ledman and Teetor, LLP. Matthew T. Hollis is admitted to practice in the State Courts of Ohio and United States District Court for the Southern District of Ohio. Mr. Hollis is a 2001 graduate of Capital University Law School and is currently an associate at Isaac, Brant, Ledman & Teetor, LLP.

Both applicants know and understand that they are charged with knowing and complying with the local rules of the United States District Court for the District of Massachusetts.

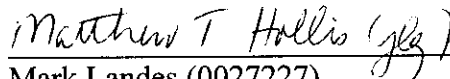
Further, neither of the applicants has been disbarred or formally censured by any entity and neither is facing disciplinary charges. Affidavits from Mr. Landes and Mr. Hollis are attached. The attorneys' firm conducts a substantial part of its practice in federal court. Both attorneys are familiar with the Federal Civil Rules, Federal Rules of Evidence and federal law. Finally, the movants have agreed to act as local counsel for any appearances necessary.

Respectfully submitted,



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